



Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
May 17, 2004



Mr. Tim Hedahl
Washington TRU Solutions
P.O. Box 2078
Carlsbad, NM 88331-2078

Subject: Issuance of Corrective Action Reports 04-020 and 04-026 from Audit A-04-25 of the LLNL/CCP

Dear Mr. Hedahl:

The Carlsbad Field Office (CBFO) performed Audit A-04-25 of the Lawrence Livermore National Laboratory (LLNL) Central Characterization Project (CCP) characterization activities on May 3-7, 2004. CBFO Corrective Action Reports (CARs) 04-020 and 04-026 are enclosed.

Please document on the enclosed CAR continuation sheets your proposed corrective actions and a schedule for completion and forward to me prior to the response due date identified in CAR block 14.

If you have any questions or comments, please contact me at (505) 234-7491

Sincerely,

Dennis S. Miehl
Quality Assurance Specialist

Enclosure(s)

cc: w/enclosures
A. Holland, CBFO *ED
K. Watson, CBFO *ED
M. Eagle, EPA *ED
E. Feltcorn, EPA *ED
R. Joglekar, EPA *ED
S. Zappe, NMED *ED
D. Winters, DNFSB *ED
A. Pangle, CTAC *ED
T. Putnam, CTAC *ED
A. J. Fisher, WRES *ED
K. Dunbar, WRES
CBFO QA File
CBFO M&RC

*ED denotes electronic distribution
CBFO:QA:DSM:GS:04-1507:UFC 2300.00

040515



INSTRUCTIONS FOR PROVIDING CORRECTIVE ACTION RESPONSE

WASTE ISOLATION PILOT PLANT
U.S. DEPARTMENT OF ENERGY
Carlsbad Field Office

CAR NO: _____
PAGE _____ OF _____

INSTRUCTIONS FOR COMPLETING A CORRECTIVE ACTION RESPONSE TO A CAR ADDRESSING A CONDITION ADVERSE TO QUALITY

You are requested to provide a corrective action in response to this corrective action report (CAR) by the due date identified in block 14 of the CAR. If this date cannot be met, provide a written request for extension to the assessment team leader (block 5). This request must include justification for the delay and must be provided prior to the due date.

The response shall address the corrective actions indicated in block 12. As appropriate, develop the response in accordance with the following sequence and format:

In order to develop the CAR response, perform an investigative action to determine the extent and impact of the deficiency and to identify the root cause. Next, determine the actions required to correct the adverse condition. The response shall include the following information, as appropriate to block 12.

1. Corrective action response for CAR # _____
 - A. **Remedial Action**-Describe actions required or taken to correct the specific conditions noted and any similar conditions identified during the investigations.
 - B. **Extent and Impact of the Deficiency**-Describe the investigative actions performed to determine the extent and impact of the condition and the results. This will include a determination of the acceptability of any data generated prior to resolution of the deficiency.
 - C. **Root Cause Determination**-Identify the root cause of the condition as determined through investigative action.
 - D. **Corrective Action to Preclude Recurrence**-Identify the actions required to address the root cause of the condition in order to preclude recurrence.
2. For each action above, identify the individual assigned responsibility for completion of the action and the anticipated (or actual, if complete) completion date.
3. The response must identify the individual having the overall responsibility for completion of the corrective actions.

CORRECTIVE ACTION REPORT

1. CAR No.: 04-020	2. Activity Report No.: A-04-025	3. Page <u>1</u> of <u>2</u>															
4. Controlling Document: WIPP WAP Section B		5. CBFO Assessment Team Leader: Dennis Miehl															
6. Responsible Organization: CCP/LLNL		7. CAQ Was Discussed With: D. Haar/J. Harrison															
<p>8. Requirement that was violated: WAP Section B Introductions and Attachment Highlights page B-2 line 29: "Characterization requirements for individual containers of TRU mixed waste are specified on a waste stream basis. A waste stream is defined as waste material generated from a single process or from an activity that is similar in material, physical form, and hazardous constituents. Waste streams are grouped by Waste Matrix Code Groups related to the physical and chemical properties of the waste. Generator/storage sites shall use the characterization techniques described in this WAP to assign appropriate Waste Matrix Code Groups for WIPP disposal. The Waste Matrix Code Groups are solidified inorganics, solidified organics, salt waste, soils, lead/cadmium metal, inorganic nonmetal waste, combustible waste, graphite, filters, heterogeneous debris waste, and uncategorized metal. Waste Matrix Code Groups can be grouped into three Summary Category groups: Homogenous Solids (Summary Category S3000), Soils/Gravel (Summary Category S4000), and Debris Waste (Summary Category S5000)."</p>																	
<p>9. Condition Adverse to Quality: In the AK Summary Report for LLNL, CCP-AK-LLNL-001, R.0 dated 2/9/04, a mixed debris stream is identified, generated by the major TRU facilities on site including Bldg. 332, 251, and 419. The description of the waste stream includes the presence of smaller containers of solidified liquid waste, both organic and inorganic waste solidified using a variety of solidification agents. A statement is made on page 63 that "there are individual containers with greater than 50% by volume homogeneous solids (solidified liquids); however, the overall average is significantly less than 50 percent." There are, in fact, at least 27 containers in the inventory that are primarily solidified liquids. The consolidation of two summary category groups into one debris stream is not justified based upon the information presented.</p>																	
10. Suggested Actions (Optional):																	
<table style="width: 100%; border: none;"> <tr> <td style="width: 60%;">11a. Significant CAQ</td> <td style="width: 40%;">No</td> </tr> <tr> <td>11b. Work Suspension Recommended</td> <td>No</td> </tr> <tr> <td>11c. RCRA-Related</td> <td>Yes</td> </tr> <tr> <td>11d. Accelerated Corrective Action Required</td> <td>No</td> </tr> </table>			11a. Significant CAQ	No	11b. Work Suspension Recommended	No	11c. RCRA-Related	Yes	11d. Accelerated Corrective Action Required	No							
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11b. Work Suspension Recommended	No																
11c. RCRA-Related	Yes																
11d. Accelerated Corrective Action Required	No																
12. Types of Actions: Remedial: <u>X</u> Investigative: <u>X</u> Root Cause: <u>X</u> Actions to Preclude Recurrence: <u>X</u>																	
13. CAR Initiator: <u>Dick Blumstein</u> <u>Thomas Putnam</u> For Date: <u>5/06/04</u>																	
<p>14. Response Due Date: <u>6-16-04</u> Corrective Action Plan Required: YES</p> <p>Required Corrective Action Completion Date: <u>N/A</u></p>																	
<table style="width: 100%; border: none;"> <tr> <td style="width: 33%;">15. a. Concurrence: <u>D. J. Miehl</u></td> <td style="width: 33%;">Date: <u>5-17-04</u></td> <td style="width: 34%;">b. <u>N/A</u></td> </tr> <tr> <td style="text-align: center;">Assessment Team Leader</td> <td style="text-align: center;">Date</td> <td style="text-align: center;">Responsible Assistant Manager</td> </tr> <tr> <td colspan="3" style="height: 20px;"></td> </tr> <tr> <td>c. <u>N/A</u></td> <td><u>N/A</u></td> <td></td> </tr> <tr> <td style="text-align: center;">Quality Assurance Manager</td> <td style="text-align: center;">Date</td> <td></td> </tr> </table>			15. a. Concurrence: <u>D. J. Miehl</u>	Date: <u>5-17-04</u>	b. <u>N/A</u>	Assessment Team Leader	Date	Responsible Assistant Manager				c. <u>N/A</u>	<u>N/A</u>		Quality Assurance Manager	Date	
15. a. Concurrence: <u>D. J. Miehl</u>	Date: <u>5-17-04</u>	b. <u>N/A</u>															
Assessment Team Leader	Date	Responsible Assistant Manager															
c. <u>N/A</u>	<u>N/A</u>																
Quality Assurance Manager	Date																
16. Corrective Actions Proposed by the Responsible Organization: Use CAR Continuation Sheet																	
17. Acceptance of Proposed Corrective Actions:																	
<table style="width: 100%; border: none;"> <tr> <td style="width: 60%; border-bottom: 1px solid black;"></td> <td style="width: 40%; border-bottom: 1px solid black;"></td> </tr> <tr> <td style="text-align: center;">Assessment Team Leader</td> <td style="text-align: center;">Date</td> </tr> </table>					Assessment Team Leader	Date											
Assessment Team Leader	Date																
18. Verification of Corrective Action Completion: (Use CAR Continuation Sheet)																	
<p>19a. Verified By: _____</p> <div style="display: flex; justify-content: space-between; width: 100%;"> Name Date </div>																	
19b. Trend Cause Code: _____																	
<p>20. Closure: _____</p> <div style="display: flex; justify-content: space-between; width: 100%;"> Quality Assurance Manager Date </div>																	

CBFO CORRECTIVE ACTION REPORT

(continuation sheet)

1. CAR No.:

2. Activity No.:

3. Page 2 of 2

Block #

CORRECTIVE ACTION REPORT

1. CAR No.: 04-026		2. Activity Report No.: A-04-25		3. Page <u>1</u> of <u>2</u>	
4. Controlling Document: DOE-WIPP-02-3122			5. CBFO Assessment Team Leader: Dennis Miehl		
6. Responsible Organization: CCP LLNL			7. CAQ Was Discussed With: B. Gillespie, R. Machado		
8. Requirement that was violated: DOE-WIPP-02-3122, Revision1, Section A-3, Page A-8: "The method used to calculate the TMU for the quantities in table A-3 must be documented and technically justified for each CBFO certified radioassay system. Compliance with this requirement will be evaluated in reviews of the TMU documentation package for each assay system by CBFO. General guidance for determining the TMU is provided in references A5 and A6."					
9. Condition Adverse to Quality: CCP Report "Total Measurement Uncertainty for the WIPP High Efficiency Neutron Counter (HENC) Revision 2 contains several errors and does not fully represent the contribution of the determination of drum density to the total measurement uncertainty for the system.					
10. Suggested Actions (Optional):					
11a. Significant CAQ :No					
11b. Work Suspension Recommended :No					
11c. RCRA-Related :No					
11d. Accelerated Corrective Action Required :No					
12. Types of Actions: Remedial: <u>X</u> Investigative: <u>X</u> Root Cause: Actions to Preclude Recurrence:					
13. CAR Initiator: <u>OTAC ATC Thomas Putnam For Patrick Kelly/Jimmy Wilburn</u> Date: <u>05/10/2004</u>					
14. Response Due Date: <u>6-16-04</u> Corrective Action Plan Required: YES Required Corrective Action Completion Date: <u>N/A</u>					
15. a. Concurrence: <u>D. J. Miehl</u> <u>5-17-04</u> b. <u>NA</u> <u>NA</u> Assessment Team Leader Date Responsible Assistant Manager Date c. <u>NA</u> <u>NA</u> Quality Assurance Manager Date					
16. Corrective Actions Proposed by the Responsible Organization: Use CAR Continuation Sheet					
17. Acceptance of Proposed Corrective Actions: Assessment Team Leader Date					
18. Verification of Corrective Action Completion: (Use CAR Continuation Sheet)					
19a. Verified By: Name Date					
19b. Trend Cause Code:					
20. Closure: Quality Assurance Manager Date					

CBFO CORRECTIVE ACTION REPORT

(continuation sheet)

1. CAR No.:

2. Activity No.:

3. Page 2 of 2

Block #_

